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June 18, 2021

Via Electronic Filing

Ex Parte Communication

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Portals II, Room TW-A325
Washington, DC 20554

Re: *Establishing the Digital Opportunity Data Collection*, WC Docket No. 19-195; *Modernizing the FCC Form 477 Program*, WC Docket No. 11-10.

Dear Ms. Dortch:

On June 16, 2021, Mary Henze, Sandy Charneski, Kristy Morris, Priya Patel (an intern), and the undersigned (all from AT&T) met with the following members of the FCC's Broadband Data Task Force: John Cobb, Steve Rosenberg, Jean Kiddoo, Sean Spivey, Kirk Burgee, and Chelsea Fallon. At the meeting, AT&T presented a proposed format that would comply with the newly adopted FCC rules for reporting coverage or availability for both terrestrial fixed and fixed wireless broadband internet services. AT&T explained that since the FCC is currently engaged in preliminary processes to develop new reporting portals and create a nationwide fabric, it is not too soon to begin looking at how the new rules could be implemented, especially given that the rules enable providers more than one reporting option. For example, terrestrial fixed broadband providers can use either polygon/shapefile or address by address (location) based reporting. For fixed wireless broadband internet service, providers can either submit propagation maps or report addresses/locations where they have broadband capability.

We explained that for both terrestrial fixed broadband and fixed wireless internet service AT&T has opted for the address by address reporting option, and we presented a sample format and the results using a test area. We confirmed that we can report fixed broadband availability data in this format for AT&T's entire footprint without any significant challenge. The proposed format is similar to the comma-separated values (CSV) format that is currently used to report census block based fixed broadband coverage in Form 477, so it can be easily adaptable to the existing reporting systems.

In addition, AT&T's presentation aimed to inform the Commission that our approach to implementing the address by address option is simple, would be useful particularly for smaller carriers which don't have GIS expertise and, as a result, could find the polygon option challenging, and it satisfies the FCC's new reporting rules and the Broadband DATA Act's reporting requirement. Members of the Data Task Force observed that although it's

still early in the process, the format in AT&T's presentation appears easily adaptable to whatever format the FCC eventually selects for the location/address-based reporting option. We discussed how the latitude and longitude references would have to be synced with the GIS reference in the Fabric so that all providers are using the same latitude/longitude for the same addresses. That, and other common reference data, can be refreshed during the initial "data handshake" with the fabric administrator which the FCC is currently in the process of selecting. The slides used in the presentation are included as an attachment.

Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in this docket.

Sincerely,

/s/ Ola Oyefusi

cc:
Chelsea Fallon
John Cobb
Jean Kiddoo
Kirk Burgee
Steve Rosenberg
Sean Spivey

ADDR_ID	BASE_ADDRESS	CITY	STATE	ZIP5	LATITUDE	LONGITUDE	IPDSL Tech Code	IPDSL Down Speed	IPDSL Up Speed	VDSL Tech Code	VDSL Down Speed	VDSL Up Speed	FTTP Tech Code	FTTP Down Speed	FTTP Up Speed	FW Tech Code	FW Down Speed	FW Up Speed
00000SHU3P	Address 1	Anytown	US	12345	34.175973	-84.823319	11	1.5	1				50	1000	1000			
00000RHCMY	Address 2	Anytown	US	12345	34.114939	-84.687914	11	18	1.5	12	75	20						
T1016ED87E8	Address 3	Anytown	US	12345	34.146755	-84.802416	11	12	1.5									
00000SI7HM	Address 4	Anytown	US	12345	34.132133	-84.801103	11	18	1.5	12	50	10						
00000SHTT8	Address 5	Anytown	US	12345	34.152934	-84.806504	11	6	1				50	1000	1000			
00000SIBNE	Address 6	Anytown	US	12345	34.109600	-84.821167							50	1000	1000			
00000SHS7E	Address 7	Anytown	US	12345	34.153973	-84.807431	11	3	1				50	1000	1000			
C1A4A046138	Address 8	Anytown	US	12345	34.173778	-84.802033	11	18	1.5									
00000SHUNG	Address 9	Anytown	US	12345	34.139392	-84.799113	11	12	1.5	12	50	10						
00000BHT4K	Address 10	Anytown	US	12345	34.319361	-85.022602	11	6	1							70	10	1
00001F2JYW	Address 11	Anytown	US	12345	34.328229	-84.995650										70	10	1
00000BHT3G	Address 12	Anytown	US	12345	34.249151	-85.017661	11	1.5	1							70	10	1

ADDR_ID	BASE_ADDRESS	CITY	STATE	ZIP5	LATITUDE	LONGITUDE	IPDSL Tech Code	IPDSL Down Speed	IPDSL Up Speed
00000SHU3P	Address 1	Anytown	US	12345	34.175973	-84.823319	11	1.5	1
00000RHCMY	Address 2	Anytown	US	12345	34.114939	-84.687914	11	18	1.5
T1016ED87E8	Address 3	Anytown	US	12345	34.146755	-84.802416	11	12	1.5
00000SI7HM	Address 4	Anytown	US	12345	34.132133	-84.801103	11	18	1.5
00000SHTT8	Address 5	Anytown	US	12345	34.152934	-84.806504	11	6	1
00000SHS7E	Address 7	Anytown	US	12345	34.153973	-84.807431	11	3	1
C1A4A046138	Address 8	Anytown	US	12345	34.173778	-84.802033	11	18	1.5
00000SHUNG	Address 9	Anytown	US	12345	34.139392	-84.799113	11	12	1.5
00000BHT4K	Address 10	Anytown	US	12345	34.319361	-85.022602	11	6	1
00000BHT3G	Address 12	Anytown	US	12345	34.249151	-85.017661	11	1.5	1

ADDR_ID	BASE_ADDRESS	CITY	STATE	ZIP5	LATITUDE	LONGITUDE	VDSL Tech Code	VDSL Down Speed	VDSL Up Speed
00000RHCMY	Address 2	Anytown	US	12345	34.114939	-84.687914	12	75	20
00000SI7HM	Address 4	Anytown	US	12345	34.132133	-84.801103	12	50	10
00000SHUNG	Address 9	Anytown	US	12345	34.139392	-84.799113	12	50	10

ADDR_ID	BASE_ADDRESS	CITY	STATE	ZIP5	LATITUDE	LONGITUDE	FTTP Tech Code	FTTP Down Speed	FTTP Up Speed
00000SHU3P	Address 1	Anytown	US	12345	34.175973	-84.823319	50	1000	1000
00000SHTT8	Address 5	Anytown	US	12345	34.152934	-84.806504	50	1000	1000
00000SIBNE	Address 6	Anytown	US	12345	34.109600	-84.821167	50	1000	1000
00000SHS7E	Address 7	Anytown	US	12345	34.153973	-84.807431	50	1000	1000

ADDR_ID	BASE_ADDRESS	CITY	STATE	ZIP5	LATITUDE	LONGITUDE	FW Tech Code	FW Down Speed	FW Up Speed
00000BHT4K	Address 10	Anytown	US	12345	34.319361	-85.022602	70	10	1
00001F2JYW	Address 11	Anytown	US	12345	34.328229	-84.995650	70	10	1
00000BHT3G	Address 12	Anytown	US	12345	34.249151	-85.017661	70	10	1

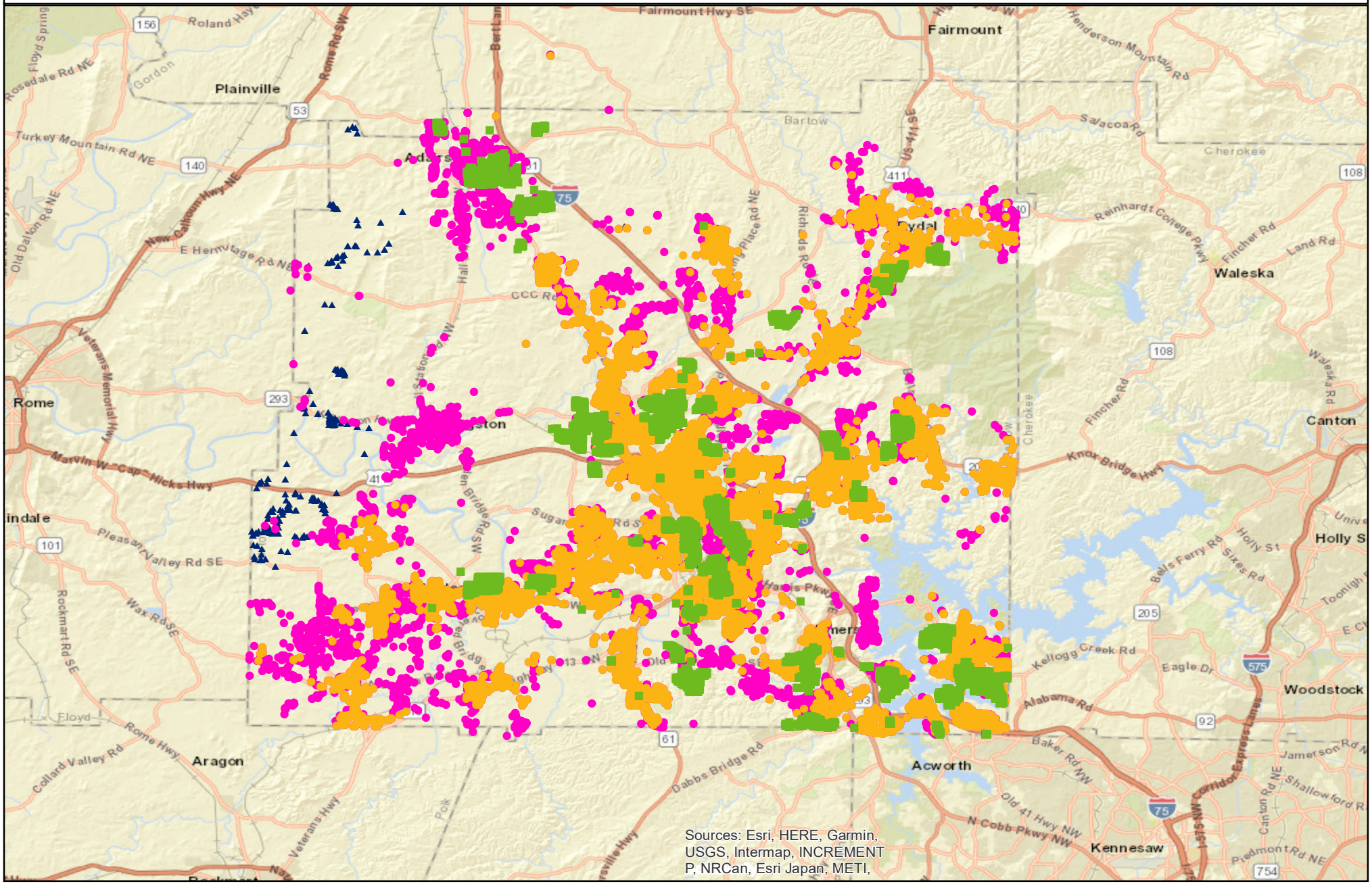
Sample Map 1

Legend

- 50 - FTTP
- 12 - VDSL
- 11 - IPDSL
- 70 - FW

EGIS Expanded

Date: 2021/06/15



Sample Map 2

Legend

- 50 - FTTP
- 12 - VDSL
- 11 - IPDSL
- 70 - FW

EGIS Expanded

Date: 2021/06/15